

12 August 2026

Infrastructure Regulation Branch

Commerce Commission

By email: infrastructure.regulation@comcom.govt.nz

Dear Commissioners,

Submission on Resilience principles for investment decision-making

The Manawatū District Council (MDC) welcomes the opportunity to provide feedback on the Commerce Commission's draft guidance *Resilience Principles: Decision-making Framework for Critical Infrastructure Providers*.

MDC is responsible for planning, delivering and maintaining a diverse portfolio of critical infrastructure and community assets that support the social, economic and environmental wellbeing of our district. Resilience considerations are already embedded across many aspects of Council's governance, asset management, infrastructure planning, emergency management and investment decision-making.

MDC supports the Commission's objective of promoting consistent, transparent and evidence-based resilience investment decisions. We particularly support the draft guidance's emphasis on proportionality and its recognition that infrastructure providers differ in size, complexity, asset portfolios and organisational maturity. These principles provide an appropriate foundation for strengthening resilience while allowing organisations to progressively improve over time.

MDC considers the guidance should complement and build upon existing planning and asset management processes rather than create a separate resilience planning framework. We encourage the Commission to continue developing practical implementation guidance that enables infrastructure providers to integrate resilience considerations into existing decision-making processes in a way that is both proportionate and achievable.

Executive Summary

MDC is broadly supportive of the proposed resilience decision-making framework.

In particular, MDC supports:

- integrating resilience into existing governance, asset management, risk management and investment decision-making processes;
- recognising that infrastructure providers have differing levels of organisational maturity;

- applying a proportionate, risk-based approach to resilience investment;
- acknowledging uncertainty as an inherent feature of long-term infrastructure planning; and
- encouraging continuous improvement rather than prescribing a single methodology.

To further strengthen the guidance, MDC recommends that the Commission:

- provide additional implementation guidance and worked examples for different infrastructure sectors;
- demonstrate how the resilience principles can be integrated with existing planning frameworks such as Asset Management Plans, Long-term Plans, Water Services Delivery Plans and emergency management planning;
- develop further guidance on identifying and assessing cross-sector interdependencies;
- recognise that resilience investments must balance technical feasibility, affordability, service levels and community expectations; and
- continue supporting flexibility by recognising existing asset management frameworks and sector-specific methodologies rather than prescribing a single approach.

MDC also considers that resilience should be viewed as an integral component of broader infrastructure planning rather than a standalone activity. In practice, resilience outcomes are frequently delivered through asset renewals, network improvements, climate adaptation initiatives, growth planning and service-level investments. Effective resilience decision-making therefore involves balancing resilience objectives with affordability, competing investment priorities and long-term community outcomes.

The following responses address each of the Commission's twelve consultation questions.

Q1 Is the draft guidance clear about its purpose and practical status, including the level of analysis and rigour the Commission expects for more material resilience expenditure proposals?

MDC supports the overall direction of the draft guidance.

The document provides a practical and well-structured framework for resilience investment decision-making and appropriately recognises that resilience should be integrated into ordinary asset management, governance, risk management and investment planning rather than treated as a separate activity. MDC particularly supports the emphasis on proportionality and the recognition that infrastructure providers are at different stages of asset management and resilience maturity. These themes make the guidance applicable across a wide range of providers while allowing organisations to progressively improve their practices over time.

Q2 Is it clear how the draft guidance should be applied proportionately across sectors with different levels of maturity?

MDC considers the guidance appropriately recognises the differing maturity levels that exist across infrastructure sectors. We support the Commission's acknowledgement that providers should continue incorporating resilience considerations while progressively improving capability, rather than delaying investment until maturity is achieved.

MDC suggests the guidance also acknowledge that many local authorities are simultaneously implementing Local Water Done Well reforms and strengthening their asset management systems. During this transition, the Commission should continue applying a proportionate approach to expectations and evidence requirements.

Q3 Are there implementation barriers, overlaps, or accountability issues in the wider resilience and regulatory landscape that may affect how this guidance is applied in practice?

MDC considers the greatest implementation challenges are likely to be:

- availability of consistent hazard information;
- differing levels of asset management maturity;
- capability and specialist resourcing;
- integration of resilience analysis into existing business case processes;
- coordination across multiple regulatory authorities.

While the guidance recognises maturity, additional practical implementation advice would assist providers in moving from existing asset management practices to the more comprehensive resilience assessments envisaged by the guidance. Practical implementation is also affected by the difficulty of determining an appropriate and affordable level of resilience. For some hazards, such as flooding, design and investment decisions can be informed by flood-hazard information, climate-change allowances and relevant technical standards. For other hazards, particularly major earthquakes, the timing and severity of an event are inherently uncertain and it may not be practicable to design infrastructure to avoid all disruption.

These decisions therefore require providers to balance risk, consequences, technical feasibility and affordability, including the level of additional resilience that communities are willing and able to fund. Multi-agency coordination is also important, as actions intended to protect or restore one asset or service may transfer risk to other infrastructure, communities or natural systems.

Q4 What areas should the Commission prioritise in further work (for example, business case guidance, resilience measures, maturity assessment, interdependency information, or reporting)?

MDC supports the Commission continuing to develop practical implementation guidance to accompany the resilience principles. In particular, we consider future work should focus on practical business case guidance, worked examples from different

infrastructure sectors, and tools that assist providers to progressively improve resilience maturity.

Additional guidance on infrastructure interdependencies would also be valuable. Local authorities operate interconnected water, transport and community infrastructure networks, and resilience investment decisions are often influenced by dependencies across sectors. Further guidance on identifying, assessing and incorporating those interdependencies into investment decision-making would assist providers.

MDC also encourages the Commission to develop guidance demonstrating how the resilience principles can be integrated with existing planning frameworks, including Asset Management Plans, Long-term Plans, Water Services Delivery Plans and emergency management planning, rather than creating separate resilience planning processes.

Further guidance would also be useful on critical-asset mapping, identifying alternative service and transport routes, and transparently balancing hazard likelihood, service consequences, affordability and the community's willingness to fund increased resilience.

Q 5. Which aspects of the draft guidance are most helpful for informing your investment decision making, and why?

MDC considers the draft guidance to be particularly helpful in recognising that resilience is not a standalone activity, but should be integrated into existing governance, asset management, risk management and investment decision-making processes. We also support the emphasis on proportionality, recognising that infrastructure providers differ in size, complexity and organisational maturity.

The guidance appropriately encourages decision-makers to consider resilience alongside affordability, service levels and long-term community outcomes, rather than treating resilience as an isolated objective. This integrated approach is particularly helpful because resilience is not always the sole or primary driver of an infrastructure investment. Projects may be initiated because of renewal needs, capacity constraints, safety, compliance, growth, climate adaptation or service-level requirements while also delivering resilience benefits. MDC also welcomes the recognition that resilience decisions often need to be made in the face of uncertainty and that continuous improvement should be expected rather than immediate perfection.

Q6. Which parts of the draft guidance are unclear, unnecessary, or could be improved? Please explain.

Overall, MDC considers the guidance to be clearly written and well structured.

There are, however, opportunities to further improve its practical application. In particular, the guidance could provide additional worked examples illustrating how the principles might be applied to different infrastructure sectors and to investments of varying scale. This would help smaller organisations apply the framework consistently while reinforcing the principle of proportionality.

MDC also suggests more clearly distinguishing between examples of good practice and regulatory expectations. While the document appropriately states that it is guidance,

some sections headed "*What we expect to see*" could be interpreted as minimum compliance requirements. Clarifying that expectations should remain proportionate to the scale, complexity and criticality of the investment would improve consistency throughout the document.

Finally, the guidance could more explicitly acknowledge that many infrastructure providers already consider resilience through existing statutory planning and asset management processes. The framework should build upon these processes rather than be interpreted as creating an additional planning framework.

Q7. Are any principles missing? Are there areas of overlap where the principles could be simplified or streamlined?

MDC does not consider any fundamental resilience principles to be missing from the framework.

However, consideration could be given to placing greater emphasis on organisational learning and continuous improvement following disruptive events. While these concepts are reflected throughout the guidance, highlighting the importance of post-event evaluation and lessons learned would reinforce the iterative nature of resilience planning and support continual improvement over time.

Q8. Are there any missing frameworks or evaluation tools that should be included or referenced?

The draft guidance appropriately references a range of recognised decision-making approaches and provides sufficient flexibility for infrastructure providers to adopt methodologies appropriate to their circumstances.

MDC considers that additional references to established local government asset management guidance, such as the International Infrastructure Management Manual (IIMM), ISO 55000 Asset Management standards, and Treasury's Better Business Case guidance, would further strengthen the document. These frameworks are already widely used across local government and would assist providers in integrating resilience considerations into existing investment planning processes.

The guidance should continue encouraging the use of recognised frameworks rather than prescribing a single methodology. The guidance should continue encouraging the use of recognised frameworks rather than prescribing a single methodology. It could also recognise practical evaluation tools already used by infrastructure providers, including hazard and flood mapping, climate-change projections, asset-criticality assessments, network vulnerability mapping and analysis of alternative service or transport routes. This flexibility is important because different infrastructure activities are subject to different technical standards, statutory planning requirements and investment-assessment processes.

Q9. To what extent do you already apply these principles in your resilience-related decision making processes? If not, what currently guides your resilience-related investment decisions?

MDC applies many of the principles outlined in the draft guidance through its asset management planning, long-term infrastructure planning, emergency management arrangements, climate adaptation work and Water Services Delivery Plan.

In practice, resilience is often incorporated through existing technical and investment processes rather than identified as a standalone objective. Examples include considering flood-hazard information and climate-change effects in infrastructure design and procurement, assessing the criticality of assets, and identifying alternative transport or service routes. However, identifying a resilience vulnerability does not automatically result in additional investment. Decisions must also take account of risk, consequences, competing priorities, practicability, affordability and the community's willingness to fund higher levels of resilience. The draft guidance's integrated approach is therefore consistent with current local government planning practice.

Q10. Do you have practical examples of applying these principles - in a specific sector, or cross-sector - that could be shared to support other users of the guidance?

MDC considers this an important opportunity to demonstrate how resilience principles are applied in practice.

Practical examples include incorporating flood-hazard information and climate-change allowances into stormwater planning, infrastructure design and procurement; identifying critical transport assets and alternative routes to support access and network recovery following disruptive events; and coordinating with regional and emergency management partners where actions affecting flood flows, roads and other critical assets need to be considered collectively.

These examples demonstrate that resilience is commonly delivered through wider renewal, safety, capacity, climate-adaptation and network-planning programmes, even where resilience is not the sole or primary investment driver. They also illustrate that identifying a critical asset, network vulnerability or alternative route is an important first step, but does not by itself establish that additional investment is justified. Providers must still assess consequences, options, affordability and competing investment priorities.

Q11. How should the framework recognise and reflect iwi, hapū, and Māori perspectives, including capability, resources, and relationships that support resilience, particularly in smaller or more isolated communities?

MDC supports recognising the important role that iwi, hapū and Māori organisations can play in understanding local hazards, environmental values and community resilience.

The guidance should encourage meaningful engagement while recognising that statutory engagement requirements already exist under a range of legislation. Wherever possible, the Commission's guidance should complement existing engagement processes rather than create parallel consultation expectations.

MDC also encourages recognition of mātauranga Māori alongside technical and engineering evidence where this contributes to understanding long-term resilience and community wellbeing.

Q12. Which cross-sector vulnerabilities and interdependencies should the framework place the greatest emphasis on, and expect infrastructure providers and the Commission to pay closest attention to?

The framework should place particular emphasis on the interdependencies between electricity, telecommunications, transport, drinking water, wastewater, stormwater, flood-management systems and emergency access. Disruption to one system can significantly affect the operation and recovery of others. For example, water and wastewater services may depend on electricity and communications, while repairs and emergency response depend on functioning roads, bridges, fuel supplies and access routes.

Particular attention should also be given to the interaction between infrastructure and natural systems. During a flood or other emergency, actions taken by one agency to manage river flows, protect infrastructure or restore access may alter risks for other assets and communities. Effective resilience planning therefore requires coordinated decision-making among territorial authorities, regional councils, emergency management agencies, lifeline utilities and transport providers. Providers should consider not only economic impacts but also public health, community isolation, accessibility, recovery capability and the disproportionate effects of service disruption on vulnerable populations.

At the same time, resilience decisions must continue to balance community expectations with affordability and long-term financial sustainability. Local government is well placed to make these decisions through existing democratic processes, including Long-term Plans and Annual Plans, where communities can express their preferences regarding service levels and investment priorities.

Yours sincerely,



Michael Ford

Mayor